

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RU-EL SAILOR,

Plaintiff,

-vs-

CITY OF CLEVELAND, *et al.*,

Defendants.

Case No. 1:20-cv-00660

Judge David A. Ruiz

**PLAINTIFF'S UNOPPOSED
MOTION FOR EXTENSION OF
DEADLINES (90 DAYS)**

Plaintiff, through counsel, respectfully requests a ninety-day extension of time for all existing deadlines in this case. This Motion is unopposed.

On June 20, 2024, the Court issued an order amending existing deadlines. (Dkt. 80). On July 17, 2024, counsel for Plaintiff filed their Motion to Withdraw. (Dkt. 82). In the Motion, counsel requested that the Court stay the case for six months to permit Plaintiff to obtain new counsel. That motion remains pending as case deadlines approach. Therefore, Plaintiff respectfully requests that the Court amend the current case calendar by adding ninety days to all existing case deadlines:

	Current Deadline	Proposed New Deadline
Fact Discovery	August 19, 2024	November 19, 2024
Plaintiff Expert Disclosures/Reports	October 16, 2024	January 16, 2025
Defense Expert Disclosures/Reports	November 18, 2024	February 18, 2024
Expert Discovery	December 16, 2024	March 16, 2024
Dispositive Motion Deadline	January 15, 2025	April 15, 2025

Undersigned counsel conferred with counsel for all Defendants, and Defendants do not object to this Motion.

This request is made in good faith and for good cause, will not unfairly prejudice any party, and has not been made for the purpose of undue delay or harassment.

Respectfully submitted,

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/Jacqueline Greene
One of the Attorneys for Plaintiff*